REMARKS

Claims 11-23 are pending in the present application. The Office Action and cited references have been considered. Favorable reconsideration is respectfully requested.

Claim 18 has been amended to add a missing period. Claim 19 has been amended to correct the antecedent basis and other typographical errors noted during review of the claims in preparing this response. Applicant respectfully submits that the amendment raises no new issues that would require further consideration or search, and therefore requests entry of the amendment.

Claims 11-23 were rejected under 35 U.S.C. §103 as being unpatentable over Paff (US Patent No. 5,164,827). This rejection is respectfully traversed for the following reasons.

Claim 11 recites a surveillance system comprising a plurality of cameras including at least two rotating cameras configured to perform a tracking/shooting function and a wide angle shooting function, intruding object recognizing means for identifying a coordinate information of an object of monitoring on a coordinate space by analyzing image signals entered from the cameras, camera function determining means for allocating, according to the coordinate information of an object of monitoring on a coordinate space, to a first camera the tracking/shooting function whose field of view is a predetermined direction of the object of monitoring and to a second camera a wide angle shooting function, and camera control means for controlling the plurality of

cameras according to the allocation of functions by the camera function determining means. This is not taught, disclosed, or made obvious by the prior art of record.

According to the claimed invention, the surveillance system includes, *inter alia*, a plurality of cameras including at least two rotating cameras configured to perform both a tracking/shooting function and a wide angle shooting function. Because of this feature, the at least two rotating cameras can dynamically adapt to perform a tracking/shooting function and a wide angle shooting function, which provides a substantial advantage over the prior art, because it allows an intruder to object to be monitored with no blind spots with a minimum number of cameras, by switching the role of detecting the object being monitored from one camera to another according to the predetermined direction of the object being monitored.

The Office Action asserts that the surveillance system of Paff comprises camera function determining means for allocating (citing col. 4, lines 15-25), according to the coordinate information of an object of monitoring on a coordinate space, to a first camera said tracking/shooting function whose field of view is a predetermined direction of said object of monitoring (citing col. 4, lines 25 -- 35) and to a second camera a wide angle shooting function (citing col. 8, lines 5-15). On the other hand, the Office Action asserts that "Paff only discloses one rotating camera, which is configured to perform a tracking/shooting function and a wide angle shooting function." The above two assertions appear to be inconsistent with one another: how to allocate to a ***first camera*** a tracking/shooting function whose field of view is a predetermined direction of said object of monitoring and to a ***second camera*** a wide angle shooting function in

contrast with the recognition that only one rotating camera that is configured to perform a tracking/shooting function and a wide angle shooting function is provided. Applicant respectfully submits that Paff does not disclose "allocating, according to the coordinate information of an object of monitoring on a coordinate space, to a first camera said tracking/shooting function whose field of view is a predetermined direction of said object of monitoring and to a second camera a wide angle shooting function" as recited in claim 11.

Paff's system as discloses comprises one master camera MD and a plurality of slave cameras SD1-SD5. The master camera MD controls action of the slave cameras SD1-SD5 by broadcasting information relating to the zooming status of the master camera MD. The slave cameras SD1-SD5, ***responsive to this information***, adjust their own zooming states so that the subject is viewed at approximately ***the same magnification as with the master camera.*** In this manner, if the zooming state of the master camera is ***set to wide angle*** so that a large group of subjects can be tracked through the premises, the slave cameras will also be ***set to a wide angle position***. Conversely, if the zooming state of the master camera ***is set tight*** so as to track a single individual through the premises, the slave cameras similarly will have a ***tight zoom setting***. See e.g., col. 7, line 67-col. 8, line 13. The above control is far different from that of the present invention, in which one camera is set in a tracking/shooting function and the other camera is set in a wide angle shooting function.

Thus, Applicant respectfully submits that Paff neither discloses the camera function determining means for allocating, according to the coordinate information of an object of monitoring on a coordinate space, to a first camera said tracking/shooting function whose field of view is a predetermined direction of said object of monitoring and to a second camera a wide angle shooting function, nor suggests the element corresponding to the camera function determining means as recited in claim 11.

The Office Action asserts that providing two cameras as recited in Applicant's claims is "merely as simple duplication of parts for a multiplied effect (i.e. the replication of master cameras), and such a modification would have been obvious to one of ordinary skill in the art in order to monitor a wider area with tracking features. . . ." Office Action, page 3. Applicant respectfully disagrees. Applicant's claim 11 not only recites at least two cameras, but also recites camera function determining means for allocating, according to the coordinate information of an object of monitoring on a coordinate space, to a first camera the tracking/shooting function whose field of view is a predetermined direction of the object of monitoring and to a second camera a wide angle shooting function, and camera control means for controlling the plurality of cameras according to the allocation of functions by the camera function determining means.

Paff is directed to the problem of how to permit a security operator to simultaneously control two cameras while tracking a subject moving through the premises. See col. 1, lines 37-63. Paff solves this problem by providing a system in which the zooming state of the slave cameras are set based on the zooming state of the

master camera. Col. 7, line 67-col. 8, line 13. Even assuming for the sake of argument only that one of ordinary skill in the art would have been motivated to provide two master cameras based on the teachings of Paff, those same teachings would have suggested that the two cameras been set to automatically have the same zoom states. Only with improper reference to hindsight reconstruction would one of ordinary skill in the art have been motivated to provide the claimed two cameras, and camera function determining means for allocating, according to the coordinate information of an object of monitoring on a coordinate space, to a first camera said tracking/shooting function whose field of view is a predetermined direction of said object of monitoring and to a second camera a wide angle shooting function, nor suggests the element corresponding to the camera function determining means as recited in claim 11.

For at least these reasons, Applicant respectfully submits the claim 11 is patentable over the prior art of record. Claims 12-23 depend from and include the recitations of claim 11. Applicant respectfully submits that claims 12-23 are patentable in and of themselves and for the reasons discussed above with respect to claim 11.

In view of the above amendments and remarks, Applicant respectfully requests entry of the proposed amendment and reconsideration and withdrawal of the outstanding rejections of record. Applicant submits that the application is in condition for allowance and early notice to this effect is most earnestly solicited.

If the Examiner has any questions he is invited to contact the undersigned at 202-628-5197.

Respectfully submitted,

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